

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Revision of the Commission's Rules)	CC Docket No. 94-102
To Ensure Compatibility with)	
Enhanced 911 Emergency Calling Systems)	
)	
E911 Compliance Deadlines for)	
Non-Nationwide Tier III CMRS Carriers)	

To: Wireless Telecommunications Bureau

**Report Regarding Phase II E911 Deployment
of OTZ Telecommunications, Inc.**

OTZ Telecommunications, Inc. ("OTZ"), by its attorneys, pursuant to Section 20.18(i) of the Federal Communications Commission's ("FCC" or "Commission") Rules,¹ hereby informs the Commission that it has now elected to pursue a network-based solution as a means of providing Phase II enhanced 911 ("E911") location-capable services to its customers.

OTZ presently operates an analog and time division multiple access ("TDMA") network for which no handset-based E911 location solutions are available. OTZ originally elected to pursue a handset-based Phase II E911 solution based on technical considerations (OTZ's system is comprised of a single cell), economic feasibility (OTZ has fewer than 200 customers and serves the small community of Kotzebue that is located in the Alaskan Tundra), and the representations of equipment manufacturers that a low cost handset-based solution would be shortly on the market.

¹ 47 C.F.R. § 20.18(i).

Since the release of the Commission's April 1, 2005 *Order*², it has become apparent to OTZ that no handset-based Phase II solutions for GSM networks are likely to become available in the near future, if ever.³ This follows on the heels of public announcements by TDMA equipment manufacturers renouncing their original claims that location capable TDMA handsets would be brought to market. OTZ currently employs a TDMA air interface for which no location capable handsets will be produced and is not confident that any location-capable GSM handsets will ever become available since the two major U.S. carriers utilizing GSM networks, Cingular and T-Mobile, have implemented network-based Phase II solutions, thus eliminating market demand for location-capable GSM handsets. In fact, in the *Order*, the FCC warned that "in the event that location-capable GSM handsets remain unavailable, we would expect carriers to actively explore other location technologies in order to achieve Phase II capability."⁴

OTZ has submitted financial data to the Commission that demonstrates the financial infeasibility of switching its air interface. Had OTZ been forced to do so and had it chosen to implement a GSM overlay, the economic viability of its operations would have been threatened without any corresponding benefit based on the continued unavailability of GSM handsets that are location capable.

OTZ has been in constant contact with its local PSAP. As indicated in its prior waiver request and evidenced by the attached letter, the PSAP is not capable of processing E911 information and will probably not have any capability to do so in the foreseeable future. Given

² *In re Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, *E911 Phase II Deadlines for Tier III Carriers*, Order, FCC 05-79 (April 1, 2005) ("*Order*").

³ See *Order* at n. 304 (noting that there are no location-capable GSM handsets).

⁴ *Order* at ¶ 116.

that the PSAP has indicated a willingness to work with OTZ on a Phase II deployment schedule in the event Phase II deployment becomes necessary, OTZ is electing to change its election from a handset-based solution to a network-based solution which will relieve OTZ of any deployment obligation until such time as it receives a PSAP request to become Phase II compliant. In the interim, OTZ will continue to monitor new products in the hope that technological advances will allow it to deploy a technically and economically feasible E911 solution in the future following an appropriate PSAP request.

Respectfully submitted,

OTZ TELECOMMUNICATIONS, INC.

By: _____-s-_____

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Dated: July 5, 2005

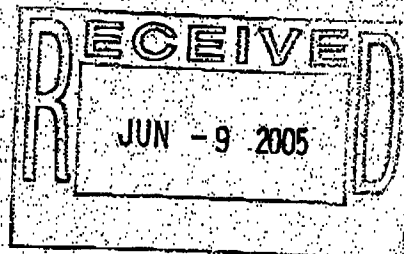
cc: Jeff Cohen, Wireless Telecommunications Bureau

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Kotzebue Police Department



Phone (907) 442-3351 Fax (907) 442-3357 Post Office Box 46 Kotzebue, Alaska 99752



Mr. Doug Neal, CEO
OTZ Telephone Cooperative, Inc.
Box 324
Kotzebue, AK 99752

Dear Doug:

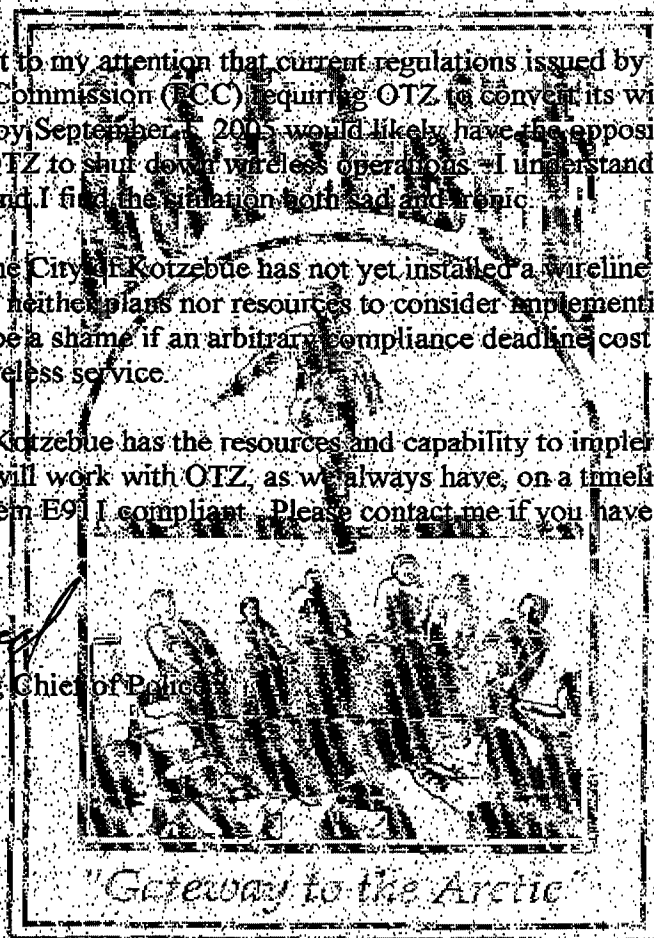
It has been brought to my attention that current regulations issued by the Federal Communications Commission (FCC) requiring OTZ to convert its wireless system to E911 compliance by September 1, 2005 would likely have the opposite and undesired effect of forcing OTZ to shut down wireless operations. I understand the bind in which OTZ finds itself, and I find the situation both sad and ironic.

The irony is that the City of Kotzebue has not yet installed a wireline E911 system. Currently we have neither plans nor resources to consider implementing a wireless E911 system. It would be a shame if an arbitrary compliance deadline cost the residents of Kotzebue their wireless service.

When the City of Kotzebue has the resources and capability to implement a wireless E911 system, we will work with OTZ, as we always have, on a timeline for making the OTZ wireless system E911 compliant. Please contact me if you have any questions.

Sincerely,

John Ward, Acting Chief of Police
City of Kotzebue



DECLARATION OF DOUG NEAL

I, Douglas A. Neal, do hereby declare under penalty of perjury the following:

1. I am the Chief Executive Officer of OTZ Telecommunications, Inc
2. I have read the foregoing "Report Regarding Phase II E911 Deployment of OTZ Telecommunications, Inc." I have personal knowledge of the facts set forth therein, and believe them to be true and correct.


Douglas A. Neal

July 1, 2005
Date

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